



January 4, 2024

Via ECF

The Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Bevelyn Williams and Edmee Chavannes, 22 Cr. 684 (JLR)*

Dear Judge Rochon:

I represent Edmee Chavannes in the above-captioned matter. I write to respectfully request a minor modification to the schedule of pretrial submissions for trial in 22 Cr. 684 (JLR) set for February 12, 2024. The Court's order dated October 27, 2023, directs the parties to submit joint requests to charge, voir dire and verdict form, and respective motions *in limine* on January 5, 2024. I respectfully request a brief extension of this schedule—such that pretrial submissions must be submitted by Monday, January 8, 2024, with responses due in accordance with this extension (*i.e.*, no later than January 15, 2024).

The reason for this request is I am currently on trial in the New York State Supreme Court, Bronx County – Criminal Term in *People v. Nahjim Luke*, Ind. CR-0492-2020. Therefore, I make this request under extenuating circumstances, in order to allow the defense two additional days over the weekend to prepare its relevant submissions.

The government, through AUSA Jamie Bagliebter, and counsel for Ms. Bevelyn Williams, Calvin Scholar, have indicated that they have no objection to this request, provided that the proposed deadlines apply to all parties.

The request is granted. The parties shall file pretrial submissions and motions in limine by **January 8, 2024**. The parties shall file responses by **January 15, 2024**.

Dated: January 4, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

cc: All counsel (via ECF)

Respectfully submitted,

/s/

Aaron Mysliwiec
Attorney for Edmee Chavannes